

**UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ERIC C. GRIMM,

Case No. 17-cv-654

Plaintiff,

Hon. Gordon J. Quist

v.

RAW STORY MEDIA, INC., THE HERALD PUBLISHING COMPANY, LLC, MLIVE MEDIA GROUP, F/K/A BOOTH NEWSPAPERS, INC., NEWSLO, STEPHEN KLOOSTERMAN, KEVIN EVEN, PAUL SHIBLEY, BRIANNA SCOTT, DAVID BOSSENBROEK, MATT J. ROBERTS, DAVID SHAFER, BARTON DIETERS, GREGORY C. PITTMAN, WILLIAMS/HUGHES, PLLC, DOUGLAS HUGHES, THEODORE N. WILLIAMS, JR., TIMOTHY HICKS, WILLIAM MARIETTI, KATHY HOOGSTRA, ROBERT CARTER, RAYMOND KOSTRZEWA, LINNEA KOSTRZEWA, MARK T. BOONSTRA, NEIL MULLALLY, VICKI BROGE, AND THE COUNTY OF MUSKEGON,

**DEFENDANTS WILLIAMS/HUGHES, PLLC AND DOUGLAS HUGHES
MOTION SEEKING DISMISSAL
UNDER FED. R. CIV. P. 12(b)(6)**

Defendants.

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**DEFENDANTS WILLIAMS/HUGHES, PLLC AND DOUGLAS HUGHES MOTION
SEEKING DISMISSAL UNDER FED. R. CIV. P. 12(b)(6)**

ORAL ARGUMENT REQUESTED

NOW COME Defendants Williams Hughes, PLLC and Douglas Hughes, by and through their attorneys, Clark Hill PLC, and moving this Court for an order dismissing Plaintiff's complaint against them, state:

1. Plaintiff Eric Grimm filed a multi-count First Amended Complaint against various Defendants, including Williams Hughes, PLLC and Douglas Hughes (the Williams Hughes Defendants).

2. Plaintiff's First Amended Complaint only specifically alleges a claim against the Williams Hughes Defendants in Count III.

3. In Count III, Plaintiff alleges that Plaintiff was terminated from his employment at a private law firm (Williams Hughes, PLLC) by a Muskegon County Judge. For the reasons set forth in the accompanying Brief, Plaintiff has failed to state a claim and this claim should be dismissed against the Williams Hughes Defendants pursuant to Fed. R. Civ. P. 12(b)(6).

4. Plaintiff also collectively sets forth a claim against "all Defendants" in Count X but alleges nothing specific against the Williams Hughes Defendants.

5. For the reasons set forth in the accompanying Brief, Plaintiff has failed to state a cognizable claim against the Williams Hughes Defendants and his claims must be dismissed pursuant to Fed. R. Civ. P. 12(b)(6).

WHEREFORE, Defendants Williams/Hughes, PLLC and Douglas Hughes ask this Court to enter an order under Fed. R. Civ. P. 12(b)(6) dismissing Plaintiff's claims against them for failure to state a claim.

Respectfully submitted,

CLARK HILL PLC

Dated: November 16, 2017

/s/ Steven F. Stapleton

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